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HEALY, TJ HEDAHL, TG

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KIRBY WA KUESTER, AW MANN HP MARX GE

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Excess Chemical Program Action Plan

Alan Church, Manager Waste Regulations Programs EG&G Rocky Flats, Inc

The DOE comments on the Excess Chemical Program Action Plan are enclosed

Please respond within one week of receipt of this letter

Paul Cote, Chief

Environmental Management Branch

Attachment

CORRES CONTROL X X PATS/T130G Adm &C

Reviewed for Addressee Corres Control RFP

9-28-13 C.

Ref Ltr #

DOE ORDER # 5400

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DOCUMENT CLASSIFICATION REVIEW WAIVER PER CLASSIFICATION OFFICE

AMFO Form 91-01 Rev 3, 09/11/92

ROCKY FLATS OFFICE AMFO REVIEW OF TECHNICAL DOCUMENTS REVIEW COMMENT RECORD

Agreement with Dispositions	Date	Reviewer	Document Preparer	S = Suggested, Non-C = Nonconcurrence
etc) Document Preparer David Grosek	Signature david Hosek	Date September 23, 1993 Phone 966-3305 Reviewer	Organization AMFO/ WPD/ ESB	nented for other than verbatim incorporation),
ite,	Execss Cilcinical Figure Diate Action Figure			*Comment Type E = Essential (agreement must be documented for other than verbatim incorporation), S = Suggested, Non-C = Nonconcurrence

Disposition										
Comment	The action plan should include all identified concerns Limited Rad screening capability has been identified as a concern Include a milestone to solve - or explain and support a conclusion that it is not a problem	The draft Envirogram did not give clear guidance on excess vs waste or on 90 Day Areas Clarify this critical information.	Evaluate whether the existing point contacts such as Environmental Coordinators or Environmental Program Managers can be used Explain what the point contacts do	Operations personnel must be included on the teams or involved with the work Explain how this will be done	Explain the purpose of this task	Evaluate and confirm that the AGMs have the technical capabilities to prepare adequate sampling plans	Indicate if the quarterly review conflicts with the 30 day hmit on recycling/ reuse. Explain why the excess chemical program will not still require excess chemicals to become waste after 30 days.	Explain the purpose of the level 4 procedure.	Explain why the Chemical Management Program Description document does not need to be changed to reflect changes in the Excess Chemical Program	Include a task to accomplish Rad screening or ensure it has been done
Para No		Item 3	Item 4	Item 6	Item I	Item 10	Item 21	Item 15		
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Disposition					0	4)	63	r es	C		u	6)					S						Jo Canad
Comment	Establish a task to perform sampling The only task present is to create the sampling teams	This item must include a number of activities such as labeling, packaging, storage, etc. Break this activity down to show the parts	Explain the purpose of this briefing	Include start dates for each task	This document is finalized after many tasks are completed Explain why this guidance document does not need to be completed before the activities are done	Include the follow-up task that indicates that these chemicals will be declared as waste on April 1, 1995	EG&G has identified ongoing actions to establish waste	minimization guidelines and time frames - a problem area	previously identified by EG&G as a problem. The action	plan does not include actions to remedy this situation	Explain actions already completed that solved the problem	and include any additional actions required to solve		The EG&G letter does not specify it all information in Part A must be completed or if certain blanks must be filled in	Explain how EG&G will ensure that operations personnel	provide adequate and accurate information	Explain how the excess Chemical Program coordinates with the plant-wide Chemical Tracking System program						
Para No		Item 19	Item 9	All Items	Item 12	Item 20							¢	Item 2									
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Document Reviewed